

August 12, 2005

Arthur Neal  
Director  
Program Administration  
National Organic Program  
USDA-AMS-TMP-NOP  
1400 Independence Avenue, SW.  
Room 4008—So  
Ag Stop 0268  
Washington, DC 20250

[National.List@usda.gov](mailto:National.List@usda.gov)

**RE: Docket No. TM-04-07  
National Organic Program, Sunset Review  
Letter To Continue to Allow Substances Identified on the National List, Sections 205.603--  
205.606**

Dear Mr. Neal,

**We are writing to support the continued allowance of all of the substances identified in Sections 205.603-205.606 of the National List.**

As one of the largest organic poultry growers in the United States, we use nearly all of the materials currently listed on the National List in our live production and plant processing operations. The materials are essential in order to allow us to continue to meet consumer demand for organic products and to raise our chickens in a humane manner. Specifically, we seek continued use of the following materials:

**Sec. 205.603 Synthetic substances allowed for use in organic livestock production.**

- (a) As disinfectants, sanitizer, and medical treatments as applicable.
  - (1) Alcohols.
    - (i) Ethanol--disinfectant and sanitizer only, prohibited as a feed additive.
    - (ii) Isopropanol--disinfectant only.
  - (2) Aspirin--approved for health care use to reduce inflammation.
  - (3) Biologics--Vaccines.
  - (5) Chlorine materials--disinfecting and sanitizing facilities and equipment. Residual chlorine levels in the water shall not exceed the maximum residual disinfectant limit under the Safe Drinking Water Act.
    - (iii) Sodium hypochlorite.
  - (6) Electrolytes--without antibiotics.
  - (7) Glucose.
  - (9) Hydrogen peroxide.

- (10) Iodine.
- (11) Magnesium sulfate.
- (14) Phosphoric acid--allowed as an equipment cleaner, Provided, That, no direct contact with organically managed livestock or land occurs.
- (b) As topical treatment, external parasiticide or local anesthetic as applicable.
- (4) Lime, hydrated--as an external pest control, not permitted to cauterize physical alterations or deodorize animal wastes.
- (5) Mineral oil--for topical use and as a lubricant.
- (c) As feed supplements--Milk replacers without antibiotics, as emergency use only, no nonmilk products or products from BST treated animals.
- (d) As feed additives.
  - (2) Trace minerals, used for enrichment or fortification when FDA approved.
  - (3) Vitamins, used for enrichment or fortification when FDA approved.
- (e) As synthetic inert ingredients as classified by the Environmental Protection Agency (EPA), for use with nonsynthetic substances or a synthetic substances listed in this section and used as an active pesticide ingredient in accordance with any limitations on the use of such substances.
  - (1) EPA List 4--Inerts of Minimal Concern.

**Sec. 205.605 Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as ``organic'' or ``made with organic (specified ingredients or food groups(s)).''**

- (a) Nonsynthetics allowed:
  - Acids (Alginic; Citric--produced by microbial fermentation of carbohydrate substances; and Lactic).
  - Agar-agar.
  - Bentonite.
  - Calcium carbonate.
  - Calcium chloride.
  - Carageenan.
  - Colors--nonsynthetic sources only.
  - Dairy cultures.
  - Diatomaceous earth--food filtering aid only.
  - Enzymes--must be derived from edible, nontoxic plants, nonpathogenic fungi, or nonpathogenic bacteria.
  - Flavors--nonsynthetic sources only and must not be produced using synthetic solvents and carrier systems or any artificial preservative.
  - Magnesium sulfate, nonsynthetic sources only.
  - Nitrogen--oil-free grades.
  - Oxygen--oil-free grades.
  - Perlite--for use only as a filter aid in food processing.
  - Potassium chloride.
  - Potassium iodide.
  - Sodium bicarbonate.
  - Sodium carbonate.
  - Yeast--nonsynthetic, growth on petrochemical substrate and sulfite waste liquor is prohibited (Autolysate; Bakers; Brewers; Nutritional; and Smoked--nonsynthetic smoke flavoring process must be documented).
- (b) Synthetics allowed:
  - Ascorbic acid.

Calcium citrate.  
 Calcium hydroxide.  
 Calcium phosphates (monobasic, dibasic, and tribasic).  
 Carbon dioxide.  
 Chlorine materials--disinfecting and sanitizing food contact surfaces, Except, That, residual chlorine levels in the water shall not exceed the maximum residual disinfectant limit under the Safe Drinking Water Act (Calcium hypochlorite; Chlorine dioxide; and Sodium hypochlorite).  
 Ferrous sulfate--for iron enrichment or fortification of foods when required by regulation or recommended by an independent organization.  
 Glycerin--produced by hydrolysis of fats and oils.  
 Hydrogen peroxide.  
 Lecithin--bleached.  
 Nutrient vitamins and minerals, in accordance with 21 CFR 104.20, Nutritional Quality Guidelines for Foods.  
 Ozone.  
 Phosphoric acid--cleaning of food-contact surfaces and equipment only.  
 Potassium carbonate.  
 Potassium citrate.  
 Potassium hydroxide--prohibited for use in lye peeling of fruits and vegetables except when used for peeling peaches during the Individually Quick Frozen (IQF) production process.  
 Potassium iodide--for use only in agricultural products labeled ``made with organic (specified ingredients or food group(s)),'' prohibited in agricultural products labeled ``organic''.  
 Potassium phosphate--for use only in agricultural products labeled ``made with organic (specified ingredients or food group(s)),'' prohibited in agricultural products labeled ``organic''.  
 Sodium citrate.  
 Tartaric acid.  
 Tocopherols--derived from vegetable oil when rosemary extracts are not a suitable alternative.

**Sec. 205.606 Nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as ``organic'' or ``made with organic (specified ingredients or food group(s)).''**

- (a) Cornstarch (native).
- (b) Gums--water extracted only (arabic, guar, locust bean, carob bean).
- (c) Kelp--for use only as a thickener and dietary supplement.
- (d) Lecithin--unbleached.

Our position of support of the continued allowance of all of the substances listed on the National List is based on the following:

**The National List is the product of a thorough and rigorous process.**

The public has already invested countless hours in evaluating numerous substances that were petitioned for inclusion in the National List. The current National List was only developed after exhaustive evaluation of these submissions, and only when supported by quantitative, objective scientific data.

**We cannot raise and process organic poultry without these substances.**

For a wide array of reasons ranging from food safety to animal welfare, all of which have been identified, quantified, and supported as part of the NOSB National List process, these materials are critical to the raising and processing of organic poultry.

**Organic poultry products fill consumer demand and keep our business viable.**

Rosie the Certified Organic Chicken was the first organic meat label of any type to be approved by the USDA. Not only does Rosie represent a significant product line for Petaluma Poultry, much of our company's legacy is represented by our deep commitment to organic production. We have a strong and growing base on consumers who rely upon us for high quality poultry products---products that we would not be able to produce without the materials included on the National List.

Given that

- there is already a process for approving non-organic substances,
- this process is science based and objective,
- only materials that are approved by this process are allowed in organic production,
- animal welfare and food safety would be jeopardized without these approved materials,
- significant unfulfilled consumer demand would result from the expiration of the National List,

our position is strongly supportive of the continued allowance of all of the substances identified in Sections 205-603-205.606 of the National List.

Dave Martinelli  
Petaluma Poultry